

IN THE DRAWINGS:

The attached sheet of drawings includes changes to Figures 1-3, 4a, 4b, 5a, 5b, and 15b, which replaces the original drawing sheets as filed. The replacement sheets have been designated by adding the legend "Prior Art."

Attachment: Replacement Sheets

REMARKS

The Office Action dated September 26, 2006, has been received and carefully noted. The above amendments to the drawings and the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1 and 5-9 are currently pending in the application. Claims 1 and 6-9 have been amended to more particularly point out and distinctly claim the invention. No new matter has been added. Claim 3 has been cancelled without prejudice or disclaimer. Claim 1 is respectfully submitted for consideration.

Claims 5-9 were allowed. Applicants thank the Examiner for this indication of allowance. Claims 6-9 have been amended to overcome an objection thereto, as noted below, and it is respectfully submitted that the amendment to claims 6-9 does not adversely affect their patentability.

Figures 1-3, 4a, 4b, 5a, 5b, and 15b were objected to because they do not include the label "Prior Art." Figures 1-3, 4a, 4b, 5a, 5b, and 15b have been amended to include such a label. It is, therefore, respectfully requested that this objection be withdrawn.

Claims 3 and 6-9 were objected to because their preambles begin with "A" instead of "The." Amendment of the preambles to "The" was requested by the Office Action. Claim 3 has been cancelled without prejudice or disclaimer, and claims 6-9 have been amended as requested. Therefore, it is respectfully requested that the objection be withdrawn.

Claim 1 and 3 were rejected under 35 U.S.C. 102(b) as being anticipated by EP 1073179 of Ozawa et al. ("Ozawa"). Applicants respectfully traverse this rejection as applied to claim 1, and submit that the rejection is moot as to claim 3, because claim 3 has been cancelled.

Ozawa generally relates to a slotless stator winding and a method for manufacturing such a winding. Ozawa corresponds to JP 2001-037130, which is based on Japanese Patent Application No. Hei 11-211395. Ozawa aims to provide high output and miniaturization, and to provide a simple method of manufacturing with good formability, as explained at paragraph [0012] thereof.

Claim 1 recites that the conductor making up the coil between the rotor and stator of the motor has "an elongated cross section" and "is provided with a rectangular cross section having a long side and a short side," wherein "the long side extends in a radial direction." Applicants respectfully submit that these features are not disclosed by Ozawa.

Ozawa does not indicate that the conductor has an elongated cross section or that it has a rectangular cross section. Instead, at paragraph [0060], Ozawa states that the cross section of the conductor is "a distorted circular cross section" and "more specifically ... an approximate square shape" while referring to Figure 7. Figure 7 shows a conductor that appears to have an elongate and rectangular cross section. However, the USPTO is not permitted to draw inferences from the scale of drawings in references, unless there is disclosure that the drawings are to scale, as explained by MPEP 2125 ("When the reference does not disclose that the drawings are to scale and

is silent as to dimensions, arguments based on measurement of the drawing features are of little value. See *Hockerson-Halberstadt, Inc. v. Avia Group Int'l*, 222 F.3d 951, 956, 55 USPQ2d 1487, 1491 (Fed. Cir. 2000) (The disclosure gave no indication that the drawings were drawn to scale. “[I]t is well established that patent drawings do not define the precise proportions of the elements and may not be relied on to show particular sizes if the specification is completely silent on the issue.”).

With regard to Figures 6 and 7 of Ozawa, Ozawa does not provide any such indication that the drawings are to scale, and, thus, the Office Action is not permitted to argue that the drawings anticipate the claim feature that the cross section of the conductor is elongate and rectangular, particularly in view of the fact that Ozawa indicates that the cross section is “distorted circular” and “square.” Accordingly, Applicants respectfully submit that there is no legal basis for the Office Action’s view that Ozawa discloses these features of claim 1.

Furthermore, even if Ozawa does disclose a conductor having such a cross-section, it does not disclose that the “the long side extends in a radial direction.” The Office Action appears to have relied upon a hand-drawn figure on page 4 of the Office Action. This drawing resembles an inversion of the view shown in the close-up of Figure 14a of the present application, but does not appear to be reasonably derived from any figure of Ozawa.

Regardless of the source of the drawing in the Office Action, the Office Action’s position that the “the long side extends in a radial direction” is mistaken. Paragraph [0059] of Ozawa clearly indicates that the wire sheaf 27 is twisted in helical

form. Thus, even if one side of Ozawa's square cross-section conductor extends radially at certain portions of the twist, it will not extend in a radial direction at other portions of the twist, and thus cannot reasonably be said to "extend in a radial direction." Accordingly, Applicants respectfully submit that Ozawa also does not disclose or suggest this feature of claim 1.

Furthermore claim 1 recites that "the coil turns are formed by a conductor consisting of a single wire." Applicants respectfully submit that Ozawa additionally does not disclose or suggest this feature of claim 1.

As the Office Action noted, Ozawa describes that the wire sheaf 27 (which the Office Action identifies as corresponding to the claimed conductor) is constructed with a plurality of magnetic wires 25 bundled together. Thus, Ozawa's conductor does not consist of a single wire because it includes a plurality of wires.

The feature of using a single wire as the conductor, as explained at paragraph [0056] of the present application, can produce the advantage of reducing eddy current with little sacrifice to the cross sectional area of the conductor. Thus, the single wire conductor can have better copper loss characteristics than a Litz wire conductor (composed of a plurality of bundled conductors).

Therefore, because Ozawa fails to disclose "the coil turns are formed by a conductor consisting of a single wire," it is respectfully requested that the rejection of claim 1 be withdrawn.

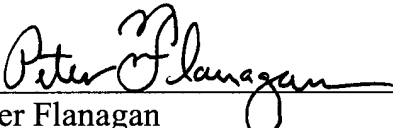
For the reasons explained above, it is respectfully submitted that each of claims 1 and 5-9 recite subject matter that is neither disclosed nor suggested in the prior art.

It is, therefore, respectfully requested that all of claims 1 and 5-9 be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,


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